Comment on IN RE: DELETE, DELETE, DELETE

GN Docket No. 25-133

Submitted: April 10, 2025

FURTHER COMMENTS for the FCC

To Whom It May Concern,

As an RF and Network engineer with over 35 years and operator in the many industries regulated by the FCC, I believe that these additional comments regarding GN Docket No. 25-133 should be given consideration by the Commission.

ELIMINATE FORM 477 REPORTING AND REPLACE IT WITH A SIMPLE SYSTEM

Using census blocks is time consuming, burdensome and an inaccurate way to show coverage. Simple require ISP's to provide addresses, coordinates and upload/download speeds in areas where they are providing service.

ELIMINATE OUTDATED BROADCAST REGULATIONS UNDER PART 73 & 74

Licensed Broadcasters in the United States have to deal with way too many burdensome and outdated requirements that should be completed ELIMINATED and do not service the Public Interest in any way. Some of these affecting Television Broadcasters are the Online Public Inspection File and Quarterly Issues and Programs Lists (47 C.F.R. §3526), Children's Programming Rules and Reporting Obligations (47 C.F.R. §670-673), EEO Rules (47 C.F.R. §3580), and Online Public Inspection File and Quarterly Issues and Programs Lists (47 C.F.R. §3526). The local public inspection file rules for commercial stations (47 C.F.R. §73.3526) require all full-service and Class A television stations to maintain an online public inspection file ("OPIF"), which is housed on the Commission's website. The rules include a requirement that licensees upload to the OPIF on a quarterly basis, lists of programs which have provided information about community issues during the preceding three months. The requirement to maintain on an ongoing basis, lists of programs which address community issues and to upload those lists each quarter is BURDENSOME, COSTLY and UNNECESSARY. Moreover, there is little evidence that those burdens and costs provide any countervailing benefits. When a public inspection file is maintained as a physical file, it was extremely rare for anyone to view the file. Even today, with the OPIF accessible online, it is very rare for anyone to request, for example, physical copies of 73.3613 documents pursuant to Section 73.3526(e)(5) of the Commission's rules. Moreover, the prospect of

enforcement action or other consequences for failing to broadcast sufficient programming to meet a station's public service obligation is, as a practical matter, remote.

ALLOW SPECIAL USE OF THE 60 METER AMATEUR BAND

Civil Defense, Disaster Recovery and Relief, Search and Rescue, and organizations who are directly involved in the repair and restoration of critical Infrastructure from disasters such Hurricane Milton and Helene should be permitted to use the 60 meter band frequencies to communicate with Amateur radio operators. It is during these critical times when HF communications are most valuable as domestic infrastructure is damaged and offline and the 60 meter frequencies can provide the link between amateurs, civilians as well as military users.

AMATEUR RADIO AND PERSONAL RADIO SERVICES

DELETE rules for the Amateur Service (Part 97) relating to external RF power amplifier certifications in Section 97.315 as this largely unnecessary these days with less power being ran by Amateur operators and violations would hardly be noticed unless they are flagrant. Allow licensed amateurs to use Amateur Service radios on the personal radio service bands such as GMRS so long as their transmitter is equivalent in quality to type-certified equipment, and appropriate power limits are followed. Many amateurs are likely doing this anyway, and unless someone is running huge amounts of power, it is unlikely that a violation of the hardware type-certification rule would be detectable. This would require an amendment to Section 95.335, or adding service-specific rules (see, e.g. section 95.735), as well as amending specific prohibitions, for example section 95.935 (CB radio service prohibition on using amateur service HF radios). Allow data transmissions on the Citizens Band (27 MHz) service, similar to the FRS and GMRS services. This would require amending section 95.971. 5. Removing the prohibition on communicating with CB operators in other countries, see Section 95.333(d). In the future the Commission should allow licensed GMRS users access to 26.960-27.410 MHz with all modes and 50 watts PEP using certified equipment with unlicensed CBRS users only permitted low power. Reallocate the 5 CBRS data channels for digital GMRS/CBRS use.

Due to time constraints again I am not going into much detail but I sincerely thank the Commission for the opportunity to make additional comments on this docket. I am confident that these proposals will enhance our nation's communication resilience and provide greater freedom for individuals and businesses to innovate and provide better service, particularly in times of disaster, while preserving the integrity of our airwaves for future generations.

Sincerely,

Fred White
Network and RF Engineer